HAZARDOUS WASTE INSPECTION

FACILITY / PHYSICAL LOCATION

Name: Enterprise Oil

5201 Middlebrook Pike Knoxville, Tennessee, 37921

County: Knox

EPA ID Number TND 98-778-0145

UOP 47-103-8001

RESPONSIBLE OFFICIAL / TITLE

Charles Alexander / General Manager

MAILING ADDRESS

Enterprise Oil P.O. Box 52044 Knoxville, TN 37921

PRIMARY CONTACT

Charles Alexander, General Manager

TELEPHONE NUMBER

Phone: 865-558-0533 Fax: 865-588-1544

DATE/TIME OF INSPECTION

June 17, 2014 / 2:00 PM

INSPECTION PARTICIPANTS / TITLES / AFFILIATIONS

Charles Alexander / General Manager / Enterprise Oil Craig Smith / Division of Solid Waste Management, KFO

REPORT PREPARED BY

Craig Smith
Division of Solid Waste Management
3711 Middlebrook Pike
Knoxville, Tennessee 37921
Phone: (865) 594-5467

PURPOSE OF INSPECTION

This inspection was conducted to evaluate Enterprise Oil compliance with the applicable requirements of the Rules and Regulations promulgated pursuant to the <u>Hazardous Waste Management Act</u>, T.C.A. 68-212-101 *et seq.*; <u>Hazardous Waste Reduction Act</u>, T.C.A 68-212-301 *et seq.*; Tennessee Hazardous Waste Management Regulations, Rule Chapter 0400-12-01;

GENERATOR STATUS

Generator status:

- Used oil transporter,
- Used oil processor,
- Used oil fuel Marketer,
- Used oil generator,
- Universal waste generator

FACILITY DESCRIPTION

Enterprise Waste Oil collects and processes used oil, primarily from auto and truck repair garages. Used oil is collected from storage tanks in 3000-gallon vacuum trucks, or used-oil containers (usually 55-gallon drums) are delivered in "straight trucks". The facility occupies a 7.3 acre lot, which includes the following structures: one office building for administration and sales, a garage for fleet maintenance, a small ancillary building for sampling near the unloading area, a series of tanks for receiving and treating incoming loads of used oil, and a larger tank-farm for storing treated oil complete with roof and loading/unloading area. The business and facility are owned by Wayman and Anna Pritchard.

INSPECTION FINDINGS

According to the annual records, Enterprise Oil received 7,185,583 gallons of used oil during 2013. Of these, 32,655 gallons were rejected as off-spec, and 6,669,766 gallons were marketed, with the remainder disposed as un-retrievable.

Facility Inspection

After a brief meeting at the administration building, Manager Charles Alexander escorted me through the receiving process, to demonstrate how used oil is received, sampled, treated, then stored.

Mr. Alexander states that all incoming loads of used oil are sampled for halogen content, to prevent contamination. Loads that are 'on spec' are unloaded through steel screen-filters into the treatment tanks, where the oil is heated to 180 degrees Fahrenheit, at which point chemical deemulsifiers are added to separate water. These treatment tanks and associated tanks are contained within a series of five separate secondary containment areas.

Solids trapped by the steel screen filters are collected and disposed at Geocycle of Dorchester South Carolina, or VLS Armor of Mt. Pleasant, Tenn. The aqueous phase from the treatment tanks is sent for treatment to MEI Aquatreat, or United Waste Water, in Ohio.

A permanently emulsified layer that remains, called the "rag layer", is eventually collected and sent for treatment, as is the recovered water. Spillage, if any, from the process of transferring from trucks into the treatment area is collected on the concrete pad and directed into a collection trench, from which it can later be collected by pump-truck and returned to the treatment process or disposed of as waste-water or "rag".

Recovered oil is pumped through filters into the treated-oil tank farm, a short distance from the treatment/processing area. These filters are replaced periodically, and sent to used-oil rerefiners for further processing.

Used oil filters are also collected from customers. The metal portion is crushed into cubes, and recycled.

Used oil

Enterprise generates its own used oil at the facility from maintenance of their own fleet of over 20 trucks used to haul oil plus various utility vehicles. All used oil is collected in an out-door steel tank labeled "used oil" and equipped with secondary containment. I observed no evidence of spillage or release.

Universal Waste

Used FLTs are collected and stored in boxes for recycling. These boxes are kept labeled, closed, and marked with an accumulation start-date that does not exceed the one-year limit.

Record Review

Storage area inspection records

All tanks, secondary containment areas, and pipes associated with handling used oil are inspected monthly, and these inspections are logged.

Vehicle inspections

All vehicles used for hauling used oil are inspected annually, and these inspections are logged and available for review.

Personnel training records

All drivers and yard-workers receive annual training including HAZCOM, last conducted on 2/4/2012. All personnel are trained with regard to spill prevention and control. All drivers have commercial-driver certification.

Contingency plan

A spill/release prevention plan for the site has been developed and certified by a professional engineer. Mr. Alexander states that all personnel are trained

Required insurance

The facility is certified with \$1 million in liability insurance, plus \$10 million for 'umbrella', and \$5 million for pollution/release.

VIOLATIONS

Based on visual observations and other evidence gathered during the June 16, 2014 inspection, no violation of the rules under Tennessee Rule Chapter 0400-12-10, Hazardous Waste Management was cited.

Craig Smith

Environmental Consultant

Division of Solid Waste Management

CONCURRENCE

Revendra Awasthi

6/25/2014

Date

Environmental Field Office Manager

Division of Solid Waste Management

DSWM Nashville Central Office, files CC: